

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z., Alexander
MARTINEZ HERNANDEZ, on behalf of
themselves as individuals and on behalf of
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES; Ur JADDOU, Director, U.S.
Citizenship and Immigration Services;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; David NEAL,
Director, Executive Office for Immigration
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &
STIPULATION**

PARTIES' JOINT STATUS REPORT AND STIPULATION

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services; Ur Jaddou, Director, U.S. Citizenship and Immigration Services; Executive Office for Immigration Review; and David L. Neal, Director, Executive Office for Immigration Review, hereby stipulate to an additional 90-day stay of proceedings as the parties continue their settlement discussions.

Plaintiffs and Defendants previously jointly stipulated to a 60-day stay in order to explore settlement possibilities. On June 27, 2022, this Court issued an order granting the 60-day stay and ordering the parties to submit a joint status report on August 29, 2022. Accordingly, Plaintiffs and Defendants submit the following update on the status of their settlement talks.

Plaintiffs and Defendants held a settlement conference on August 3, 2022, where they discussed the claims for the putative classes and agreed that there was potential for resolving many, if not all of the claims without the need of further litigation. Defendants requested Plaintiffs follow up with a written framework providing general parameters for resolving the claims. Plaintiffs submitted a document with a proposed settlement framework to Defendants on August 12, 2022. Defendants are currently reviewing that document, but have noted that they are not positioned to provide a written response until October 13, 2022.

In light of these developments in the settlement discussions, the parties now stipulate to a 90-day extension. Good cause exists for the stipulation because the complexity of the issues in this case requires additional time and there continues to be a meaningful opportunity to reach a settlement that would conserve judicial resources, as well as those of the Parties.

The parties respectfully request an order from the Court further staying Defendants' responsive deadlines and setting a deadline for a joint status report for November 28, 2022, 90-days from today's date. At that time, the parties will provide the Court with an update on the status of settlement talks and, if applicable, any proposed deadlines.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this ____ day of _____.

For the Plaintiffs:

/s/ Matt Adams

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For the Defendants:

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 30th day of August.



The Honorable John H. Chun
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that, on August 29, 2022, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter.

Dated: August 29, 2022

/s/ Matt Adams

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